

1 [Counsel Listed on Signature Page]
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB
ORDER ADOPTING
STIPULATION REGARDING
PRODUCTION OF HYPERLINKED
MATERIAL

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

JOINT STATUS REPORT

Pursuant to Dkt. No. 2432, Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”) (jointly, “the parties”), respectfully submit this Joint Stipulation.

I. Production of Requested Hyperlinked Material

With respect to the following categories of material i) hyperlinks to non-Google Drive documents,¹ ii) hyperlinked documents contained within non-Gmail documents, and iii) hyperlinked documents contained within earlier-in-time emails within an email thread, the Parties hereby stipulate as follows:

1. Plaintiffs will be permitted to make one request per week, by Wednesday of each week, until the deadline for substantial completion of fact discovery, for no more than ten (10) hyperlinked documents that have otherwise not been produced, by providing Defendants a list of the specific hyperlinks along with the document Bates number in which each hyperlink appears.
 2. In response to these once-weekly requests, Defendants will have five (5) business days to provide the requested hyperlinked documents to Plaintiffs to the extent the requested hyperlinked document is an internal Uber document that “is not privileged or otherwise protected from disclosure,” *see* ECF No. 2432 at 2, 6, and available to be collected.
 3. If Defendants are unable to satisfy or fulfill Plaintiffs’ request(s), the Parties are required to meet-and-confer upon request within 3 business days of Defendants’ deadline to provide the requested hyperlinked documents, and Defendants will provide a written response indicating why they are unable to satisfy or fulfill Plaintiffs’ request(s). If Plaintiffs are unsatisfied by the Defendants’ explanation for why such additional documents cannot be produced, the meet-and-confer will qualify as the Parties’ final meet-and-confer for the purposes of PTO 8.
 4. The limit of ten (10) hyperlinked documents per week set forth in Paragraph 1 is the compromise to which the parties have agreed for the purpose of completing depositions of Uber’s custodians. Before the deadline for substantial completion of fact discovery, the parties

¹ This stipulation does not pertain to the hyperlinked Knowledge-Base document issue or Defense Fact Sheet productions that are being handled separately.

1 will participate in a meet-and-confer to address any additional reasonable requests for
 2 hyperlinked documents in any of the enumerated categories, above the weekly production
 3 provided in Paragraph 1 (to the extent Plaintiffs have such requests). To the extent the parties
 4 are unable to come to an agreement, any party may address the dispute via PTO 8.

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8 By: */s/ Roopal Luhana*
 ROOPAL P. LUHANA (*Pro Hac Vice*)
CHAFFIN LUHANA LLP
 600 Third Avenue, Fl. 12
 New York, NY 10016
 Telephone: (888) 480-1123
 Email: luhana@chaffinluhana.com
Co-Lead Counsel for Plaintiffs

12 SARAH R. LONDON (SBN 267083)
GIRARD SHARP LLP
 601 California St., Suite 1400
 San Francisco, CA 94108
 Telephone: (415) 981-4800
 slondon@girardsharp.com
 RACHEL B. ABRAMS (SBN 209316)
PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP
 555 Montgomery Street, Suite 820
 San Francisco, CA 94111
 Telephone: (415) 426-5641
 Email: rabrams@peifferwolf.com

19 ROBERT ATKINS (*Pro Hac Vice* admitted)
 ratkins@paulweiss.com
 CAITLIN E. GRUSAUSKAS (*Pro Hac Vice*
 admitted)
 cgrusauskas@paulweiss.com
 ANDREA M. KELLER (*Pro Hac Vice* admitted)
 akeller@paulweiss.com
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
 1285 Avenue of the Americas
 New York, NY 10019
 Telephone: (212) 373-3000
 Facsimile: (212) 757-3990

By: */s/ Michael B. Shortnacy*
 MICHAEL B. SHORTNACY (SBN: 277035)
 mshortnacy@shb.com
SHOOK, HARDY & BACON, L.L.P.
 2121 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Telephone: (424) 285-8330
 Facsimile: (424) 204-9093

PATRICK OOT (*Pro Hac Vice* admitted)
 oot@shb.com
SHOOK, HARDY & BACON, L.L.P.
 1800 K Street NW, Suite 1000
 Washington, DC 20006
 Telephone: (202) 783-8400
 Facsimile: (202) 783-4211

RANDALL S. LUSKEY (SBN: 240915)
 rluskey@paulweiss.com
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
 535 Mission Street, 24th Floor
 San Francisco, CA 94105
 Telephone: (628) 432-5100
 Facsimile: (628) 232-3101

ATTESTATION

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

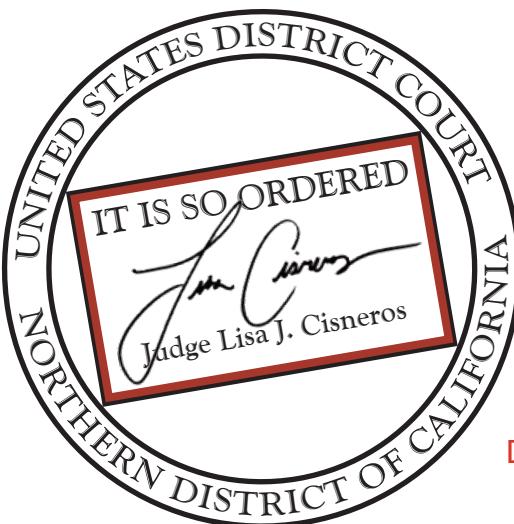
Dated: March 10, 2025

By: s/ Michael B. Shortnacy
Michael B. Shortnacy

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Michael B. Shortnacy
Michael B. Shortnacy



Dated: March 11, 2025